

Message

From: Walker, Stuart [Walker.Stuart@epa.gov]
Sent: 7/2/2018 6:16:01 PM
To: Young, Dianna [Young.Dianna@epa.gov]; Anderson, RobinM [Anderson.RobinM@epa.gov]; Kappelman, David [Kappelman.David@epa.gov]; Nguyen, Lyndsey [Nguyen.Lyndsey@epa.gov]; Poore, Christine [Poore.Christine@epa.gov]
Subject: FW: "EPA cleanup standard" for handout? FW: Hunters Point contextual tool
Attachments: Excerpts from documents 5-7-2018.docx; RadRiskQAwithtransmitmemo_June_13_2014 highlighted excerpts 4-29-2018.pdf; RAD HP Context final.pptx

fyi

Stuart Walker
Superfund Remedial program National Radiation Expert
Science Policy Branch
Assessment and Remediation Division
Office of Superfund Remediation and Technology Innovation
W (703) 603-8748
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From: LEE, LILY
Sent: Saturday, June 30, 2018 11:45 AM
To: Janda, Danielle L CIV <danielle.janda@navy.mil>
Cc: derek.j.robinson1@navy.mil; Walker, Stuart <Walker.Stuart@epa.gov>
Subject: FW: "EPA cleanup standard" for handout? FW: Hunters Point contextual tool

Dear Danielle and Derek,

Thank you for your messages. I apologize for the delay in responding. I regret that I did not review the previous fact sheets as carefully as I should have. I appreciate that you have called to my attention this issue before the next fact sheets go out. If you have any of the previous fact sheets still available to the public online, please modify those accordingly.

Regarding potential language for a new contextual tool, Please see the attached "Excerpts" Word file, which I originally sent to you May 7. The first page is the most relevant. Here are some of those excerpts:

"this ARAR evaluation tool should not be used as a to be considered (TBC) as a basis for establishing 12 mrem/yr cleanup levels at CERCLA remedial sites"

EPA has made the policy decision to use the NCP's risk range in developing cleanup levels for radionuclides at CERCLA remedial sites rather than using dose-based

EPA generally uses 1×10^{-4} in making risk management decisions.

Stuart gave a link to a collection of EPA fact sheets. Here is an excerpt from p. 20 from the pdf at that link.

"EPA generally considers excess cancer risk in the range of 1 out of ten thousand people to 1 out of one million people, or 10^{-4} to 10^{-6} , as a protective range for both chemical and radioactive contaminants"

I suggest you could use that language in your contextual tool.

I am cc'ing Stuart Walker. I will be out of the office next week visiting in-laws in Baltimore. If you need help urgently, I will sometimes be checking email. But if you need a response sooner, in my absence, in case Stuart is in the office, he is another resource.

Lily

-----Original Message-----

From: Janda, Danielle L CIV [<mailto:danielle.janda@navy.mil>]

Sent: Wednesday, June 27, 2018 11:16 AM

To: LEE, LILY <LEE.LILY@EPA.GOV>

Cc: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO <derek.j.robinson1@navy.mil>

Subject: Contextual Tool for July 11 Meeting

Hi Lily,

I am working on this contextual tool for perspective on radiation levels for Derek while he is out. I know you've been discussing with him what the appropriate EPA level would be to put on our figure. I brought it up with our management that you don't agree with the 12 mRem/yr. They were wondering if you would be ok with it if we re-phrased the description. I was thinking of replacing it with "EPA Protective Dose-Based Requirement" which is a paraphrase of a quote from the OSWER guidance which says: this guidance "changes the Superfund recommendation on what is considered a protective dose-based ARAR from 15 to 12 millirem per year (mrem/yr).

Would you be ok with this?

Keep in mind the point of this is just to put various levels into perspective. It's not a tool to negotiate cleanup levels.

V/r,

Danielle Janda

Environmental Engineer

NAVFAC Southwest

Navy BRAC PMO West

33000 Nixie Way

Bldg 50, 2nd Floor

San Diego, CA 92147

Phone: 619-524-6041

Begin forwarded message:

From: "Robinson, Derek J CIV NAVFAC HQ, BRAC PMO" <derek.j.robinson1@navy.mil>

Date: June 4, 2018 at 6:54:28 AM PDT

To: "LEE, LILY" <LEE.LILY@EPA.GOV>

Cc: "Lane, Jackie" <Lane.Jackie@epa.gov>

Subject: RE: "EPA cleanup standard" for handout? FW: Hunters Point contextual tool

That doesn't help.

The prior factsheet listed 15 mrem/year as the EPA standard. Then the prior fact sheet was incorrect. 15 mrem/yr is the EPA standard for High Level Waste disposal (e.g., Yucca, WIPP). To my knowledge this number has changed to 12 mrem/year. What has changed is EPA

evaluation level for determining if an ARAR will be considered sufficiently protective. As you can see on the factsheet, we are giving examples of what safe levels are. What level does EPA believe is safe? 10^{-4} to 10^{-6} for all carcinogens at a site (chemical and radiological cancer risks summed)

-----Original Message-----

From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]

Sent: Thursday, May 31, 2018 2:15 PM

To: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO <derek.j.robinson1@navy.mil>

Cc: Lane, Jackie <Lane.Jackie@epa.gov>

Subject: [Non-DoD Source] "EPA cleanup standard" for handout? FW: Hunters Point contextual tool

Dear Derek,

I'm sorry I forgot to send back to you response from HQ below. HQ also wants to make sure that CERCLA sites use the risk range and that they sum chemical and radiation risk.

Does this help?

From: Walker, Stuart

Sent: Tuesday, May 22, 2018 10:14 AM

To: LEE, LILY <LEE.LILY@EPA.GOV <mailto:LEE.LILY@EPA.GOV> >

Subject: Re: Can you recommend what would be appropriate to use as "EPA cleanup standard" for handout? FW: Hunters Point contextual tool

We don't have a dose based cleanup standard for Superfund so the chart is incorrect.

EPA does have a collection of fact sheets on Superfund radiation issues in this 60 page pdf.

<https://semspub.epa.gov/work/HQ/176332.pdf>

On page 12 is a similar summary of sources of radiation exposure (this is from an EPA webpage from our Office of Radiation and Indoor Air). On page 20 is a description of the risk range.

From: LEE, LILY

Sent: Monday, May 21, 2018 7:34 PM

To: Walker, Stuart

Subject: Can you recommend what would be appropriate to use as "EPA cleanup standard" for handout? FW: Hunters Point contextual tool

Dear Stuart,

I received this chart from the Navy. They would probably intend this for public distribution. What would be appropriate to put for EPA standard?

Thanks!

- Lily

-----Original Message-----

From: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [<mailto:derek.j.robinson1@navy.mil>]

Sent: Monday, May 21, 2018 3:20 PM

To: LEE, LILY <LEE.LILY@EPA.GOV> <<mailto:LEE.LILY@EPA.GOV>> >

Subject: FW: Hunters Point contextual tool

Hi Lily,

The attached was originally made for Treasure Island. It has been changed and includes updates for HP specific information and new guidance from EPA. Please check to confirm the change for EPA guidance.

Thank you and let me know if you have any questions.

Best Regards,

Derek J. Robinson, PE
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San Diego CA 92147
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